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BY: Jeffrey M. Scott (PA Id. No. 60184)

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Attorney for Defendants Delaware County d/b/a

George W. Hill Correctional Facility, Laura K. Williams,

Dele Faly and Lisa Mastroddi

ANTHONY PIERRE,

Plaintiff,

v.

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COURT OF COMMON PLEAS,

DELAWARE COUNTY, PENNSYLVANIA

NO. CV-2022-004140

DELAWARE COUNTY D/B/A GEORGE

W. HILL CORRECTIONAL FACILITY;

LAURA K. WILLIAMS; DELE FALY;

LISA MASTRODDI; K. MOORE; G.

BLEE; MIKE MOORE; SERGEANT

HAMRE; SERGEANT SICOLLE;

SERGEANT RICHBERT; JESSAMINE

HEALTHCARE, INC.; JESSAMINE

HEALTHCARE, INC. D/B/A CORRECT

CARE SOLUTIONS, LLC/ WELLPATH,

LLC; DR. NANCY, PHYSICIAN FOR

JESSAMINE HEALTHCARE, INC. D/B/A

CORRECT CARE SOLUTIONS,

LLC/WELLPATH, LLC; NURSE HAITAN,

NURSE FOR JESSAMINE HEALTHCARE,;

INC. D/B/A CORRECT CARE

SOLUTIONS, LLC/WELLPATH, LLC,

Defendants.

PLEASE TAKE NOTICE that a Notice of Removal of this action from the Court of Common Pleas of Delaware County, docketed at *Pierre v. Delaware County d/b/a George W. Hill Correctional Facility, et al.*, No. CV-2022-004140, to the United States District Court for the Eastern District of Pennsylvania, a copy of which is attached hereto as Exhibit A, has been filed in the United States District Court for the Eastern District of Pennsylvania. Accordingly,

and pursuant to 28 U.S.C. § 1446(d), this Court may proceed no further unless the case is remanded to it.

/s/Jeffrey M. Scott

Jeffrey M. Scott

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jscott@archerlaw.com Attorney for Defendants

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COURT OF COMMON PLEAS,

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NO. CV-2022-004140

DELAWARE COUNTY D/B/A GEORGE

W. HILL CORRECTIONAL FACILITY;

LAURA K. WILLIAMS; DELE FALY;

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BLEE; MIKE MOORE; SERGEANT

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CARE SOLUTIONS, LLC/ WELLPATH,

LLC; DR. NANCY, PHYSICIAN FOR

JESSAMINE HEALTHCARE, INC. D/B/A

CORRECT CARE SOLUTIONS,

LLC/WELLPATH, LLC; NURSE HAITAN,

NURSE FOR JESSAMINE HEALTHCARE,;

INC. D/B/A CORRECT CARE

SOLUTIONS, LLC/WELLPATH, LLC,

Defendants.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the Notice of Filing of Notice of Removal was served on July 29, 2022, upon counsel through the electronic filing system, and by first class mail, addressed as follows:

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/s/Jeffrey M. Scott

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